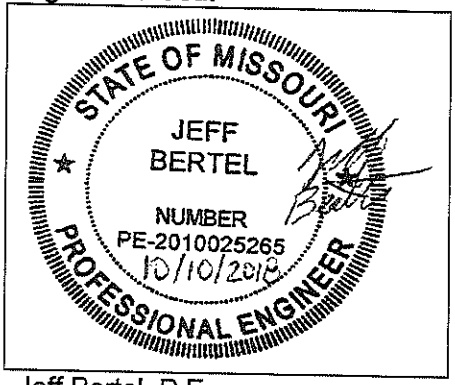
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment RCPA at the Rush Island Energy Center was evaluated to determine if it was constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of 40 CFR §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
RCPA (Ash Pond)	No

Engineer's Seal



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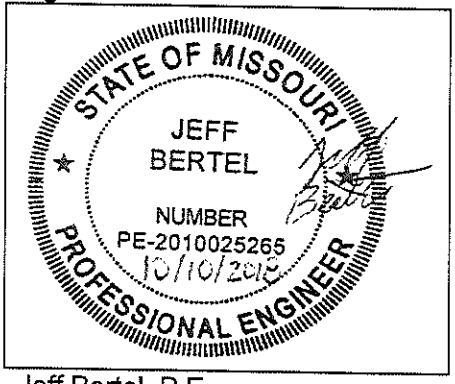
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment LCPB at the Labadie Energy Center was evaluated to determine if it was constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of 40 CFR §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
LCPB (Fly Ash Pond)	No

Engineer's Seal



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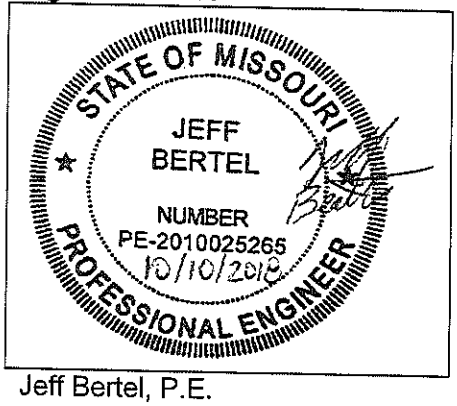
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundments MCPA, MCPB and MCPC at the Meramec Energy Center were evaluated to determine if they were constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR units and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of 40 CFR §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
MCPA, MCPB and MCPC (Bottom Ash Pond)	No

Engineer's Seal



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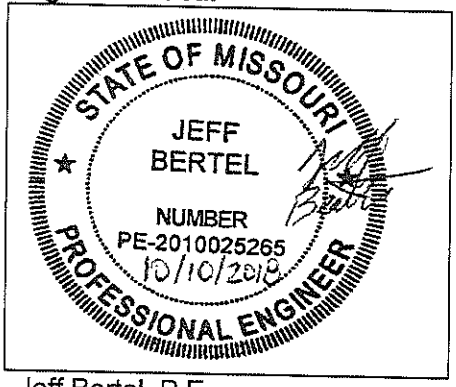
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment SCPC at the Sioux Energy Center was evaluated to determine if it was constructed with a base that located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
SCPC (Gypsum Pond Cell 1)	No

Engineer's Seal



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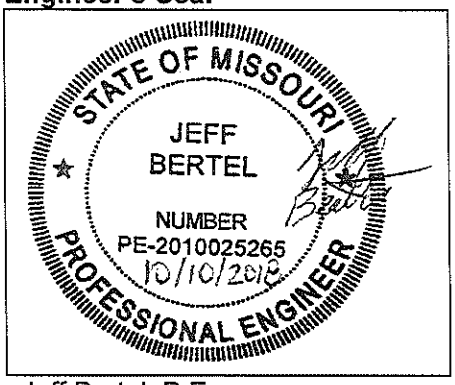
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment SCPA at the Sioux Energy Center was evaluated to determine if it was constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
SCPA (Bottom Ash Pond)	No

Engineer's Seal



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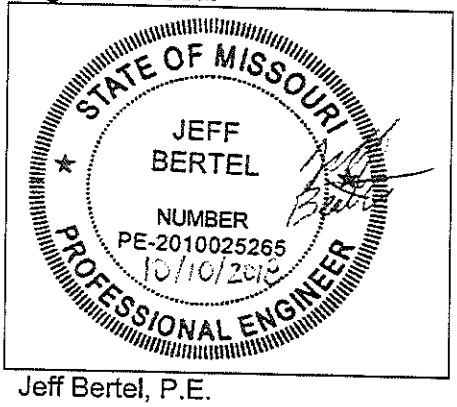
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment LCPA at the Labadie Energy Center was evaluated to determine if it was constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of 40 CFR §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
LCPA (Bottom Ash Pond)	No

Engineer's Seal



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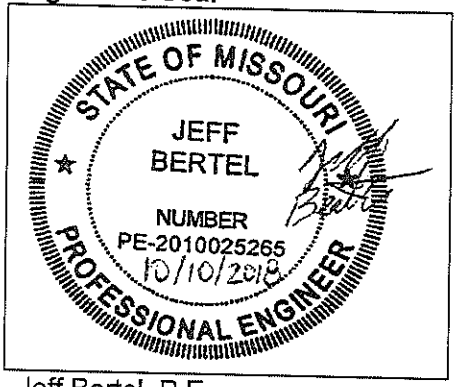
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment MCPD at the Meramec Energy Center was evaluated to determine if it was constructed with a base that is located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR 257.60
MCPD (Fly Ash Pond 498)	No

Engineer's Seal



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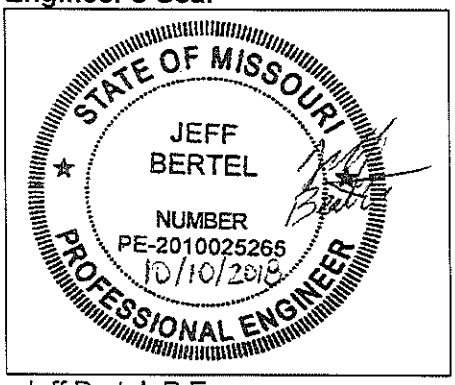
1. Engineering Certification – Placement Above the Uppermost Aquifer

The existing CCR surface impoundment SCPB at the Sioux Energy Center was evaluated to determine if it was constructed with a base that located no less than 5 feet above the upper limit of the uppermost aquifer, or if it can be demonstrated that there will not be intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table) to meet the requirements of §257.60, Placement Above the Uppermost Aquifer for Existing CCR Surface Impoundments.

CCR Unit	Meets requirements of 40 CFR §257.60
SCPB (Fly Ash Pond)	No

Engineer's Seal



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